

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

PROSKAUER ROSE LLP,

Plaintiff,

v.

JONATHAN O'BRIEN,

Defendant.

Case No.: 1:22-cv-10918-AT-SLC

STIPULATION AND [PROPOSED] ORDER REGARDING TEMPORARY STAY

This Stipulation and Proposed Order is entered into by and between Plaintiff Proskauer Rose LLP ("Proskauer") and Defendant Jonathan O'Brien ("O'Brien") (each a "Party" and, together, the "Parties"), to request that the Court temporarily stay all proceedings and deadlines in the above-captioned matter for a period of 30 days from the date of this Order to enable the Parties to discuss potential settlement.

IT IS HEREBY AGREED by the Parties, and ORDERED by the Court, that:

- (i) Counsel for the Parties will meet and confer over the course of 30 days from the date of this Order to discuss potential settlement.
- (ii) During such time, the Court hereby stays all proceedings and deadlines, including the deadline for Defendant to submit an Answer and all discovery deadlines, for 30 days from the date of this Order.

DATED: May 30, 2023

DEBEVOISE & PLIMPTON LLP

By: /s/ Jyotin Hamid

Jyotin Hamid

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Attorneys for Plaintiff Proskauer Rose LLP

DATED: May 30, 2023

BECK REED RIDEN LLP

By: /s/ Russell Beck
Russell Beck
Sarah C. Tischler

Attorneys for Defendant Jonathan O'Brien

SO ORDERED

Hon. Analisa Torres U.S.D.J., S.D.N.Y.
_____, 2023